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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Faith Brown, an individual,

Plaintiff,

V.

Robert L. Wilkie, Secretary of Veterans Affairs.

**Defendant.**

Case No: 2: 19-cv-00976-GMN-NJK

## **Motion for Extension of Time (First Request)**

Federal Defendant respectfully moves for a 30-day extension of time, from August 12, 2019 to September 12, 2019, to file a response to Plaintiff's Complaint (ECF No. 1).

This is the first request for an extension of time.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendant requests additional time to file a response to the Complaint for the reasons set forth below.

Defense counsel has had to devote time to a number of other matters during the past several weeks including summary judgment and other briefs in *Randolph v. McMahon*, No. 2:18-cv-00238-APG-NJK, *Shull v. U.S. Dep’t Ed.*, No. 2:18-cv-01781-APG-BNW, and

1 *Langford v. Social Security Administration*, No. 3:19-c-v-00324-MMD-WCG. A summary  
2 judgment brief is due today in *Randolph*. Additionally, undersigned defense counsel has not  
3 yet received file materials from the client agency relative to this matter. Such file materials  
4 would be helpful, if not necessary, in responding to the allegations in the Complaint.

5 For the above reasons, Federal Defendant respectfully requests this extension of time,  
6 from August 12, 2019 to September 12, 2019, to file a response to Plaintiff's Complaint. This  
7 motion is filed in good faith and not for the purposes of undue delay.

8 | Respectfully submitted this 12nd day of August 2019.

NICHOLAS A. TRUTANICH  
United States Attorney

s/ Patrick A. Rose  
PATRICK A. ROSE  
Assistant United States Attorney

**NO FURTHER EXTENSIONS WILL BE GRANTED.**

**IT IS SO ORDERED.**

Dated: August 13, 2019

Nancy J. Koppe  
United States Magistrate Judge